

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE MF GLOBAL HOLDINGS	:	
LIMITED SECURITIES LITIGATION	:	Civil Action No. 1:11-CV-07866-VM
THIS DOCUMENT RELATES TO:	:	
All Securities Actions	:	ECF CASE
( <i>DeAngelis v. Corzine</i> )	:	
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**NOTICE OF LEAD PLAINTIFFS' MOTION FOR (I) PRELIMINARY APPROVAL  
OF THE INDIVIDUAL DEFENDANT SETTLEMENT, (II) CERTIFICATION OF  
THE INDIVIDUAL DEFENDANT SETTLEMENT CLASS, AND (III) APPROVAL  
OF NOTICE TO THE INDIVIDUAL DEFENDANT SETTLEMENT CLASS**

TO: All Counsel of Record

PLEASE TAKE NOTICE that upon the Stipulation and Agreement of Settlement with Individual Defendants dated as of July 2, 2015 (the "Individual Defendant Stipulation")<sup>1</sup>, attached hereto as Exhibit 1; the accompanying memorandum of law; and all other papers and proceedings herein, Lead Plaintiffs the Virginia Retirement System and Her Majesty The Queen In Right Of Alberta ("Lead Plaintiffs"), on behalf of themselves, the other named plaintiffs in the Action, and the other members of the Individual Defendant Settlement Class, hereby move this Court, under Rule 23 of the Federal Rules of Civil Procedure, for an order: (i) preliminarily approving the proposed Individual Defendant Settlement; (ii) certifying the proposed Individual Defendant Settlement Class, certifying Lead Plaintiffs as class representatives for the PwC Settlement Class, and appointing Co-Lead Counsel Bernstein Litowitz Berger & Grossmann LLP and Bleichmar Fonti Tountas & Auld LLP as class counsel for the Individual Defendant Settlement Class; (iii) approving the form and manner of giving notice of the proposed

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<sup>1</sup> All capitalized terms used herein shall have the meanings provided in the Individual Defendant Stipulation.

Individual Defendant Settlement, the proposed Plan of Allocation, and Co-Lead Counsel's motion for an award of attorneys' fees and reimbursement of expenses to the Individual Defendant Settlement Class; and (iv) scheduling a hearing to consider final approval of the Individual Defendant Settlement, approval of the Plan of Allocation, and approval of Co-Lead Counsel's motion for an award of attorneys' fees and reimbursement of expenses, and any other related matters. Attached hereto as Exhibit 2 is the [Proposed] Order Preliminarily Approving Proposed Settlement with Individual Defendants and Providing for Notice and its exhibits.

Dated: July 7, 2015  
New York, New York

Respectfully submitted,

**BERNSTEIN LITOWITZ BERGER  
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- and -

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***Co-Lead Counsel for Lead Plaintiffs  
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